

1 Michael Kind, Esq.  
2 Nevada Bar No.: 13903  
3 **KIND LAW**  
4 8860 South Maryland Parkway, Suite 106  
5 Las Vegas, Nevada 89123  
6 (702) 337-2322  
7 (702) 329-5881 (fax)  
8 mk@kindlaw.com  
9 *Attorney for Plaintiff Borivoj Saric*

10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 Borivoj Saric,  
14  
15 Plaintiff,  
16  
17 v.  
18  
19 Trans Union, LLC and Kia America  
20 Inc. dba Kia Motor Finance,  
21  
22 Defendants.

Case No.: 2:22-cv-01272-CDS-VCF  
**Motion for an extension of time for  
Defendant Experian Information  
Solutions, Inc. to respond to  
Plaintiff's complaint**

23 Borivoj Saric ("Plaintiff"), by and through counsel, hereby requests an  
24 extension of time for Trans Union, LLC ("Defendant") to respond to the  
25 complaint. Defendant's responsive pleading was due on September 1, 2022.  
26 This is the first request for an extension of this deadline.

27 Pursuant to LR IA 6-1(a), Plaintiff and Defendant failed to request an  
extension prior to the answer deadline as a result of excusable neglect. Both  
parties had initially agreed to an extension, but the deadline had passed while  
settlement discussions were still ongoing. Plaintiff and Defendant are still  
actively engaged in case-resolution negotiations.

1 In good faith and not for the purposes of delay, Plaintiff submits this  
2 motion, on behalf of Defendant, and requests that this Court extend Defendant's  
3 deadline to file its responsive pleading until on or before **October 31, 2022**.

4 Dated: September 23, 2022.

5 **KIND LAW**

6 /s/ Michael Kind

7 Michael Kind, Esq.

8 8860 South Maryland Parkway, Suite 106

9 Las Vegas, Nevada 89123

10 *Attorney for Plaintiff Borivoj Saric*

11  
12 IT IS SO ORDERED:

13 

14 UNITED STATES MAGISTRATE JUDGE

15  
16 DATED: 9-26-2022